SIMMONS JANNACE DELUCA, LLP

ATTORNEYS AT LAW
43 CORPORATE DRIVE
HAUPPAUGE, NEW YORK 11788-2048
(631) 873-4888
FAX (631) 873-4889

September 9, 2021

Counsel

Susan B. Jannace Ross M. Chinitz^

*Also Admitted NJ ^Also Admitted CT

^Also Admitted CT

Mary C. Azzaretto Daniel P. Borbet Irina Feferman* Ian E. Hannon Aric H. Peymann

Kevin P. Simmons

Steven D. Jannace

Allison C. Leibowitz

Stacey Ramis Nigro Michael C. Lamendola*

Sal F. DeLuca^

nann

Via ECF

Honorable Nelson Stephen Roman United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601-4150

Re: Vasquez, Ivan v. Costco Wholesale Corporation, et al

Docket No.: 20-cv-7059 Our File No: 537-9531

Dear Judge Roman:

This office represents defendant, Costco Wholesale Corporation ("Costco") i/s/h/a Costco Wholesale Corporation and Costco Wholesale Membership, Inc., in connection with the above-referenced matter. Kindly allow this correspondence to serve as a joint request by the parties for an adjournment of the October 22, 2021 case management conference.

The reason for the adjournment is that by Order dated August 19, 2021, Magistrate Judge Andrew E. Karuse graciously extended the discovery deadline to October 27, 2021, in order to allow the parties to complete the remaining material discovery (ECF Doc. No. 41). Accordingly, as discovery will not yet be complete ahead of the October 22, 2021 conference date, the parties respectfully request the conference be adjourned and propose the following alternative dates: December 1, 2021, December 2, 2021 or December 3, 2021.

There have been no prior applications to adjourn the October 22, 2021 conference.

USDC SDNY	
DOCUMENT	
ELECTRONIC	ALLY FILED
DOC#:	
DATE FILED:	9/16/2021

Honorable Nelson Stephen Roman United States District Court Southern District of New York September 9, 2021 Page 2

Thank you for this opportunity to address the Court in this matter.

Respectfully submitted,

Ian E. Hannon

IEH:

cc: Via ECF

Mariangela Chiaravalloti, Esq. Friedman, Friedman & Chiaravalloti 65 Broadway, Suite 1604 New York, New York 10006

Due to an extension of the discovery deadlines, the parties' joint request to adjourn the Status Conf. from Oct. 22, 2021 until Dec. 1, 2021 at 10:00 am is GRANTED. The conf. will be held by AT&T Teleconference. To access the teleconference, please follow these directions: (1) Dial the Meeting Number: (877) 336-1839; (2) Enter the Access Code: 1231334 #; (3) Press pound (#) to enter the teleconference as a guest. Clerk of Court requested to terminate the motion (doc. 42).

Dated: Sept. 16, 2021 White Plains, NY

SO ORDERED:

HON. NELSON S. ROMÁN UNITED STATÉS DISTRICT JUDGE